

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK



JAMES KARAM and LISA KARAM,

Plaintiffs,

-against-

COUNTY OF RENSSELAER, NEW YORK, et al.

Defendants.

**PLAINTIFFS'
INITIAL RULE 26
DISCLOSURES**

1:13-CV-1018

INITIAL DISCLOSURES PURSUANT TO RULE 26(a) OF THE FRCP

Plaintiffs, James Karam and Lisa Karam, make the following initial disclosures as required by Rule 26(a) of the Federal Rules of Civil Procedure:

INDIVIDUALS WITH DISCOVERABLE INFORMATION

1. Subject to amendment, the names and addresses of individuals likely to have discoverable information that the Plaintiffs may use to support their claims are:

James Karam
c/o Bosman Law Firm, LLC
6599 Martin Street
Rome, New York 13440

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices; financial loss; emotional and physical injury; harm to family relations and other damages.

Lisa Karam
c/o Bosman Law Firm, LLC
6599 Martin Street
Rome, New York 13440

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices; financial loss; emotional and physical injury; harm to family relations; loss of services.

Jack Mahar
c/o William Firth
Bailey, Kelleher & Johnson, PC
Pine West Plaza 5, Suite 507
Washington Avenue Extension
Albany, New York 12205
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Patrick Russo
c/o William Firth
Bailey, Kelleher & Johnson, PC
Pine West Plaza 5, Suite 507
Washington Avenue Extension
Albany, New York 12205
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Kathleen Jimino
c/o William Firth
Bailey, Kelleher & Johnson, PC
Pine West Plaza 5, Suite 507
Washington Avenue Extension
Albany, New York 12205
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Harold Smith
c/o William Firth
Bailey, Kelleher & Johnson, PC
Pine West Plaza 5, Suite 507
Washington Avenue Extension
Albany, New York 12205
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Tom Hendry
c/o William Firth
Bailey, Kelleher & Johnson, PC
Pine West Plaza 5, Suite 507
Washington Avenue Extension
Albany, New York 12205

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Linda Baldwin
c/o William Firth
Bailey, Kelleher & Johnson, PC
Pine West Plaza 5, Suite 507
Washington Avenue Extension
Albany, New York 12205

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Ruth Vibert
c/o Elmer Keach III, Esq.
1040 Riverfront Center
P.O. Box 70
Amsterdam, New York 12010

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Jamie Smith
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Sam Rounds
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Laura Abbott
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Scott Biette
Rensselaer County Sheriff's Office
4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Tom Ali

Rensselaer County Sheriff's Office

4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Cliff McClaine

Rensselaer County Sheriff's Office

4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Marcelle Connor

Rensselaer County Sheriff's Office

4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Tim Dobert

Rensselaer County Sheriff's Office

4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Jeff Rankin

Rensselaer County Sheriff's Office

4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Tom Sawyer

Rensselaer County Sheriff's Office

4000 Main Street

Troy, New York 12180

Subject of information: workplace discrimination; retaliation; deprivation of benefits;

employer policies and practices.

Bobby Eckert
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Michelle Downey
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

Scott Ryan
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

John Gorman
Rensselaer County Sheriff's Office
4000 Main Street
Troy, New York 12180
Subject of information: workplace discrimination; retaliation; deprivation of benefits; employer policies and practices.

RELEVANT DOCUMENTS AND THINGS

2. All documents, data compilations, and tangible things that the Plaintiff may use to support her claims are, upon information and belief, already in the Defendants' possession. Said documents include without limitation: the Plaintiff's personnel files, payroll records, and any other file(s) or communications, electronic or otherwise, maintained by the Defendants concerning the Plaintiff James Karam, and any employment policies, procedures, contracts or manuals utilized by

the County of Rensselaer and/or the Rensselaer County Sheriff's Department.

Plaintiffs may also use the following: transcript of Plaintiff James Karam's 50-h hearing from May 29, 2013 and Plaintiff James Karam's EEOC complaint, no. 525-2013-00553.

INFORMATION RELATED TO THE CALCULATION OF DAMAGES

3. Plaintiffs claim damages based upon needless physical pain and suffering, emotional and psychological injury and harm, loss of consortium, loss of income and benefits, loss of enjoyment of life, injury to reputation, loss of pension and/or retirement benefit credits, and out-of-pocket expenses, and legal fees.

INSURANCE

4. There are no insurance agreements required to be disclosed pursuant to Rule 26(a)(1)(D) of the Federal Rules of Civil Procedure by the Plaintiffs.

Plaintiffs reserves the right to further supplement these disclosures if and when additional information required to be disclosed under Rule 26 of the FRCP becomes available to them.

DATED: December 5, 2013
Rome, New York



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Albany, New York 12205

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1040 Riverfront Center
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Amsterdam, New York 12010